

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

In re:	)	
	)	
Evette Nicole Reed,	)	Case No. 14-44818-705
	)	
Debtor.	)	
_____	)	
In re:	)	
	)	
Pauline A. Brady,	)	Case No. 14-44909-705
	)	
Debtor	)	
_____	)	
In re:	)	
	)	
Lawanda Lanae Long,	)	Case No. 14-45773-705
	)	
Debtor	)	
_____	)	
In re:	)	
	)	
Marshall Beard,	)	Case No. 14-43751-705
	)	
Debtor	)	
_____	)	
In re:	)	
	)	
Darrell Moore,	)	Case No. 14-44434-705
	)	
Debtor	)	
_____	)	
In re:	)	
	)	
Nina Lynne Logan,	)	Case No. 14-44329-705
	)	
Debtor	)	
_____	)	
In re:	)	
	)	
Jovon Neosha Stewart,	)	Case No. 14-43912-705
	)	
Debtor	)	
_____	)	
In re:	)	
	)	
Angelique Renee Shields,	)	Case No. 14-43914-705
	)	
Debtor	)	
_____	)	

**RESPONDENT CRITIQUE SERVICES, LLC'S**  
**MOTION TO RECUSE JUDGE RENDLEN**

COME NOW Defendant Critique Services and moves this Court to Recuse itself under 28 U.S.C. §455(a) for the following reasons:

1. When he was a U.S. Trustee from June 2003 until May 2006, Judge Rendlen initiated two adversary proceedings against Critique Services, LLC and Beverly Holmes-Diltz, its owner and sole member. See Adversary Proceeding 03-4003 and Bankruptcy Case 02-53575-A172-7 (In re: Deborah Thompson) and Adversary Proceeding 05-04254 and Bankruptcy Case 05-43244-A659-7 (In re: David Hardge). In those two cases, Judge Rendlen was the Adversary, the person who brought claims against Critique Services, LLC.

2. By his own acknowledgment in the bankruptcy Cause No. 11-46399-705 (Docs. 200 & 201 at pg. 43), Judge Rendlen, then U.S. Trustee, had supervisory responsibility for the attorneys who pursued the claims brought against Critique Services, LLC in those Adversary proceedings.

3. Judge Rendlen also stated that, as U.S. Trustee, he received numerous complaints against Critique Services, LLC (Docs. 200 & 201 at pp. 43-44).

4. 28 U.S.C. §455(a) provides that a judge should recuse himself from handling a matter if an objective observer acting reasonably would believe that the judge's impartiality is brought into question. For this reason, Judge Rendlen should recuse himself from presiding over this Adversary proceeding.

5. Defendant Critique Services, LLC acknowledges that this Motion and the accompanying Memorandum of Law are essentially the same as those filed in Adversary

Proceeding No. 13-04284-705 in bankruptcy Case No. 11-46399-705 by Critique Services, LLC and others and that Judge Rendlen denied the Motion to recuse filed in that adversary proceeding. However, Critique Services, LLC was recently joined into these Motions to Disgorge. In an effort to preserve its rights in all regards, Critique Services, LLC renews its Motion to Recuse anticipating that Judge Rendlen has not changed his opinion concerning this Motion.

WHEREFORE, Defendant Critique Services, LLC prays that this Honorable Court, Judge Charles Rendlen, recuse himself from presiding over the above-captioned Motions to Disgorge and grant such other and further relief as the Court deems just under the circumstances herein.

Respectfully submitted,

/s/ Laurence D. Mass  
Laurence D. Mass #30977  
Attorney for Critique Services, LLC  
230 So. Bemiston Ave., Suite 1200  
Clayton, Missouri 63105  
Telephone: (314) 862-3333 ext. 20  
Facsimile: (314) 862-0605  
Email: [laurencedmass@att.net](mailto:laurencedmass@att.net)

**CERTIFICATE OF SERVICE**

By signature above I hereby certify that I electronically filed the foregoing with the Clerk of the United States District Court, Eastern District of Missouri by using the CM/ECF system, and that a copy will be served by the CM/ECF system upon those parties indicated by the CM/ECF system.

By: /s/ Laurence D. Mass